

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

X

THOMAS HARMANN,

Plaintiff,

-against-

CV-04-1784 (ILG) (CLP)

THE COUNTY OF NASSAU, NASSAU COUNTY POLICE  
DEPARTMENT, POLICE OFFICER KARL N. SNELDERS,  
POLICE OFFICER MICHAEL KNATZ, DEPUTY  
INSPECTOR ROBERT TURK, LIEUTENANT THOMAS  
ZAMOJCIW, POLICE OFFICER KEVIN W. SMITH, POLICE  
OFFICER PHIL P BRADY, DETECTIVE BARRY O.  
FRANKLIN, POLICE OFFICER THOMAS O. McCAFFREY  
and "JOHN and JANE DOES 1-15" representing as yet  
unknown and unidentified police officers.

Defendants.

X

**STIPULATION OF CONFIDENTIALITY**

It is hereby stipulated and agreed, by and between Plaintiff, by his undersigned counsel  
and Defendants, by their undersigned counsel that:

1. The Defendants agreed or were otherwise directed by the Court to provide the Plaintiff in  
this action with certain records and/or documents of the Nassau County Police Department and  
records pertaining specifically to Defendants Police Officer Karl N. Snelders and Police Officer  
Michael Knatz that are not already in the public domain.
2. The Plaintiff hereby agrees that he will not disseminate or disclose, or cause to be  
disseminated or disclosed, to any individual, any of the information produced or contained in the  
documents disclosed.
3. The Plaintiff further agrees that he will use the documents and/or information provided  
solely for the purposes of this action and will not disseminate or disclose, or cause to be  
disseminated or disclosed, any documents and/or information contained within.

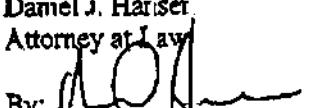
4. The Plaintiff further agrees that he will not make additional copies of these documents and/or records unless necessary for the purposes of this action and, in any event, will not retain any copies of these documents and/or records after trial in this action.

5. The Plaintiff further agrees to return all copies of all documents and/or records provided to Plaintiff to the attorney for the Defendants when this action has been terminated.

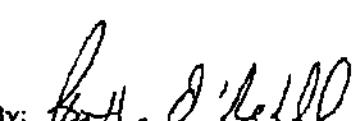
For purposes of this Stipulation, a facsimile shall be deemed an original copy.

Dated: April 7, 2005

Daniel J. Hansen,  
Attorney at Law

By:   
Daniel J. Hansen,  
233 Broadway, 1<sup>st</sup> Floor  
New York, New York 10279  
(212) 697-3701

LORNA B. GOODMAN  
Nassau County Attorney

By:   
Bethany O'Neill (BBO 0862)  
Deputy County Attorney  
One West Street  
Mineola, New York 11501  
(516) 571-6146  
Attorney for Defendants

SO ORDERED:

Cheyf Pall  
usmj  
4/15/05